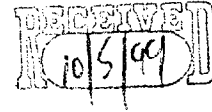




September 24, 1999



The Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C. Street S.W.
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statement:

- (1) Allorganic Trace Minerals-B12 complex acts as a catalyst and cofactor in countless enzymatic processes throughout the human body.*

This statement is made for a dietary supplement containing a proprietary blend kelp, alfalfa, magnesium citrate, dried pea (vine) juice, bovine orchic extract, bovine bone, dried buckwheat (leaf) juice, buckwheat (seed), defatted wheat (germ), oat flour, dicalcium phosphate, carrot (root), and peanut (bran). Other ingredients include manganese lactate, potassium para-aminobenzoate, honey, iron liver chelate, zinc liver chelate, copper liver chelate, calcium stearate, prolamine iodine (zein), and cyanocobalamin. And the name of the product is Allorganic Trace Minerals-B12®.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden
Standard Process Inc.

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